

Remarks

The present amendment is responsive to the Office Action mailed in the above-referenced case on August 26, 2002. Claims 1, 3-7, 9-13 and 15-17 are presented below for examination. The drawings are objected to under 37 CFR 1.83(a), stating that the bridge unit must be shown in the drawings or the feature canceled from the claims. Further, claims 16-17 are rejected under 35 U.S.C. 112, second paragraph as being indefinite. Claims 1, 3-7, 9-13 and 15-17 are rejected under 35 U.S.C. as being then patentable over Iwami et al. in view of Guck.

Regarding the drawing objection the Examiner states that the bridge between two like networks such as between DNTs and between connection oriented networks must be shown or the feature(s) must be canceled from the claim(s). Applicant wishes to clarify to the Examiner that an alternative embodiment to the invention as claimed in the base claims is disclosed in applicant's specification (page 23, lines 11-17), wherein computerized "bridges similar to bridge 87 (Fig. 5) may be provided between any two protocol-incompatible networks. So the bridge unit claimed is clearly shown in the drawings. The interface and functionality described is not necessarily limited to connection-oriented networks interfacing with non-connection-oriented networks. Two DNT networks of dissimilar data protocol could be similarly linked, and two connection-oriented networks having incompatible call protocol could also be similarly linked, for example". The embodiment is characterized in applicant's depending claims 16 and 17.

The Examiner has rejected claims 16 and 17 as being indefinite. Claims 16 and 17 both depend from claim 13 which recites a first port and associated circuitry for receiving and placing calls upon a COST network, and a second port and circuitry for receiving and placing calls upon an IPNT

network. In response to the Examiner's rejection of claims 16 and 17, applicant herein cancels claims 16 and 17, and includes the limitations of both claims in a newly added claim 18 written in independent form.

Applicant's newly added claim 18 recites:

18. (New) A computerized telephony bridge unit, comprising:

a first port and associated circuitry for receiving and placing calls on a first network, including circuitry for generating data according to a compatible protocol for the first network;

a second port and associated circuitry for receiving and placing calls on a second network, including circuitry for generating data according to a compatible protocol for the second network, the protocol for the second network being different than the protocol for the first network;
and

conversion circuitry for converting data dynamically between calls interfaced at the first and second ports;

wherein control routines functioning as part of the bridge unit receive a first call from the first network, place a call associated with the received call to a destination in the second network, and dynamically converts data between the associated calls, the dynamic conversion of data enabling two people to engage in a live conversation even though each call is implemented in a different data protocol.

As the embodiment described in the portion of applicant's specification cited above is now characterized by the limitations of the newly added independent claim 18, applicant believes said amendments should overcome the Examiner's objection to the drawings and rejection of the claims as indefinite.

The Examiner has rejected claims 1, 3-7, 9-13 and 15-17 as being unpatentable over Iwami in view of Guck. The Examiner states that, regarding independent claims 1, 7 and 13, Iwami substantially discloses the limitations of applicant's claims, but does not specifically disclose that the LAN network includes the Internet. The Examiner relies on Guck to teach that the network could be either Intranet or Internet, stating that Iwami discloses that the communication terminal could be using TCP/IP or UDP/IP; voice communication may be adopted to support these protocols, and it therefore would have been obvious to combine the systems of Iwami and Guck.

Applicant has carefully studied the prior art presented by the Examiner, and must respectfully traverse the Examiner's position. Applicant points out and argues the key limitations in applicant's base claims, which clearly distinguish applicant's claims over the prior art either singly or combined.

Applicant asserts that Iwami's teaching is limited to the local area network (LAN), and the combined art does not teach or suggest a system wherein two people engage in live conversation wherein one is on the COST or PSTN network, and the other is on the Internet or DNT network. Applicant disagrees with the Examiner's reasoning that because an IP protocol is used on the LAN of Iwami that it is suggested to be part of the Internet as the packets are formatted to be transported on the Internet. The packets formatted in Iwami are taught to be specifically for the LAN. Applicant argues that there is no teaching, suggestion, or motivation in the combines art to communicate the voice packets created in Iwami over the Internet as suggested by Guck.

Guck discloses a multi-user network where multiple client modules operating with different protocols may receive an original source document in the properly compatible format for the client's receiving appliance. Guck

teaches a file format conversion system which converts the format of an original source file document to a format compatible with the requirements of the receivers appliance, and transmits the re-formatted file over the Internet using the appropriate protocol for the receiver. However, a key distinction in Guck is that the different protocols used in the transmission of the data are taught to be protocols compatible with either Web browsing, mail or news user groups, i.e. HTTP, FTP, SMTP or NNPT. There is no capability, suggestion or motivation whatsoever in Guck for dynamically converting data formats of calls to and from COST or IPNT protocols, such as would be required for conducting a live conversation over the Internet between two participants, where one participant is on a COST network, and the other participant is on an IPNT network.

Guck teaches a connection between server processes 52 (Fig. 1) and a PSTN 60. However, Guck teaches that the connection is for the purpose of enabling communication between server processes 52 and a fax group 70, or telephone 80 using interactive voice response (IVR). Applicant argues that there is nothing whatsoever in the reference having anything to do with placing and receiving COST or IPNT calls or converting such calls between the protocols. Guck teaches a completely different invention for solving a completely different problem than that of applicant's invention, and deals with completely different protocols for transmitting files over the Internet.

Applicant believes, therefore, that the combined art clearly and unarguably fails to specifically teach all of the limitations of applicant's independent claims 1, 7 and 13, and newly added independent claim 18. Claims 3-6, 9-12 and 15 are then patentable on their own merits, or at least as depended from a patentable claim.

As all of the claims have been shown to be patentable over the prior art, applicant respectfully requests that the rejections be withdrawn and that the case be passed quickly to issue.

If there are any extensions of time required beyond any extension specifically petitioned and paid with this response, such extensions are hereby requested. If there are any fees due beyond any fees paid by check with this response, authorization is given to deduct such fees from deposit account 50-0534.

Version With Markings to Show Changes Made

In the claims:

Cancel claims 16 and 17.

Please add the following claim.

18. (New) A computerized telephony bridge unit, comprising:

 a first port and associated circuitry for receiving and placing calls on a first network, including circuitry for generating data according to a compatible protocol for the first network;

 a second port and associated circuitry for receiving and placing calls on a second network, including circuitry for generating data according to a compatible protocol for the second network, the protocol for the second network being different than the protocol for the first network; and


 conversion circuitry for converting data dynamically between calls interfaced at the first and second ports;

 wherein control routines functioning as part of the bridge unit

receive a first call from the first network, place a call associated with the received call to a destination in the second network, and dynamically converts data between the associated calls, the dynamic conversion of data enabling two people to engage in a live conversation even though each call is implemented in a different data protocol.

Respectfully,
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